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Defendant SHAKEY'S
PIZZA ASIA VENTURES, INC., and Third-
Party Defendants SPAVI INTERNATIONAL,
US, INC., CINCO COROPROATION; and PC
INTERNATIONAL PTE, LTD.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Plaintiff,

v.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING,
LLC, a Delaware limited liability
company; GUY KOREN, an individual;
POTATO CORNER LA GROUP, LLC,
a California limited liability company;
NKM CAPITAL GROUP, LLC, a
California limited liability company; J &
K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California
limited liability company; J&K
VALLEY FAIR, LLC, a California
limited liability company; J & K
ONTARIO, LLC, a California limited
liability company; HLK MILPITAS,
LLC, a California, limited liability
company; GK CERRITOS, LLC, a
California, limited liability company;
J&K PC TRUCKS, LLC, a California
limited liability company; and, GK

Case No. 2:24-CV-04546-SB(AGR_x)

Hon. Stanley Blumenfeld

**JOINT STATUS REPORT OF ALL
PARTIES' SETTLEMENT
NEGOTIATIONS**

Date: May 23, 2025

Time: 8:30 a.m.

Courtroom: 6C

Complaint Filed: May 31, 2024

Trial Date: August 4, 2025

CAPITAL GROUP, LLC, a California limited liability company and DOES 1 through 100, inclusive,

Defendants.

PCJV USA, LLC, a Delaware limited liability company; PCI TRADING LLC, a Delaware limited liability company; POTATO CORNER LA GROUP LLC, a California limited liability company; GK CAPITAL GROUP, LLC, a California limited liability company; NKM CAPITAL GROUP LLC, a California limited liability company; and GUY KOREN, an individual,

Counter-Claimants,

v.

SHAKEY'S PIZZA ASIA VENTURES, INC, a Philippines corporation,

Counter Defendant.

PCJV USA, LLC, a Delaware limited liability company; PCI TRADING LLC, a Delaware limited liability company; POTATO CORNER LA GROUP LLC, a California limited liability company; GK CAPITAL GROUP, LLC, a California limited liability company; NKM CAPITAL GROUP LLC, a California limited liability company; and GUY KOREN, an individual,

Third Party Plaintiffs,

v.

PC INTERNATIONAL PTE LTD., a Singapore business entity; SPAVI INTERNATIONAL USA, INC., a California corporation; CINCO CORPORATION, a Philippines corporation; and DOES 1 through 10, inclusive,

Third Party Defendants.

JOINT STATEMENT

Pursuant to this Court’s Case Management Order (Dkt. 29), Counsel for all the named parties, submit the joint statement status report regarding settlement.

A settlement conference proceeded on May 7, 2025 with Magistrate Judge Alicia Rosenberg. The parties discussed potential frameworks for resolution and are continuing to have settlement discussions through Magistrate Judge Rosenberg. To facilitate settlement, a “creative way” to potentially resolve the dispute has been proposed, and one of the parties is reducing it to writing to be considered over the next week. The parties understand that Magistrate Judge Rosenberg intends to schedule a second session of the settlement conference next week.

With regard to next Friday’s Post Settlement Status Conference (May 23, 2025), the parties have differing requests of this Court. Because it is unlikely that the settlement talks will have concluded by next Friday’s Post Settlement Status Conference (May 23, 2025), Counsel for Defendants, Cross-Complainants, and Third-Party Plaintiffs believe a continuance of the Post Settlement Status Conference makes sense. Counsel for Plaintiff, Counterclaim Defendant, and Third-Party Defendants posit that the already scheduled appearance may nevertheless be a good opportunity to discuss the Case Management Order or, alternatively, a motion and briefing schedule to modify same, just in case the Settlement Conference is ultimately unsuccessful. Counsel for Defendants, Cross-Complainants, and Third-Party Plaintiffs have communicated in writing and in person in March 2025 that they oppose a modification to the Case Management Order. Counsel for Plaintiff, Counterclaim Defendant, and Third-Party Defendants are willing to take the lead on ensuring that a further in person meet and confer be conducted regarding the Case Management Order prior to May 23, 2025, should the hearing proceed, with sufficient time to present any filing that this Court requests within 24 hours of that hearing.

1
2 Dated: May 16, 2025
3

FOX ROTHSCHILD LLP

4 /s/ Michael D. Murphy

5 Michael D. Murphy

6 Matthew Follett

7 Jordan Zollicoffer

8 Attorneys for Plaintiff and Counterclaim

9 Defendant SHAKEY'S

10 PIZZA ASIA VENTURES, INC., and

11 Third-Party Defendants SPAVI

12 INTERNATIONAL, US, INC., CINCO

13 COROPROATION; and PC

14 INTERNATIONAL PTE, LTD.

15 DATED: May 16, 2025

BLANK ROME LLP

16 By: /s/ Todd Malyn

17 Arash Beral

18 Todd Malynn

19 Victor Sandoval

20 Attorneys for Defendant

21 PCJV USA, LLC, PCI TRADING, LLC, GUY

22 KOREN, POTATO CORNER LA GROUP,

23 LLC, NKM CAPITAL GROUP, LLC, J & K

24 AMERICANA, LLC, J&K LAKEWOOD, LLC,

25 J&K OAKRIDGE, LLC, J&K VALLEY FAIR,

26 LLC, J & K ONTARIO, LLC, J&K PC

27 TRUCKS, LLC, GK CAPITAL GROUP, LLC,

28 HLK MILPITAS, LLC, and GK CERRITOS,

LLC

CERTIFICATE OF SERVICE

The undersigned certifies that, on May 16, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's ECF filing system. I further certify that all counsel for all parties to this action are registered CM/ECF user and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: May 16, 2025

FOX ROTHSCHILD LLP

/s/ Michael Murphy

Michael D. Murphy
Attorneys for Plaintiff SHAKEY'S
PIZZA ASIA VENTURES, INC.